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PUBLIC UTILITIES
COMMISSION

BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Application of)
)
HAWAIIAN ELECTRIC COMPANY, INC.)
)
For Approval of Rate Increases and)
Revised Rate Schedules and Rules)
)

DOCKET NO. 2008-0083

DEPARTMENT OF DEFENSE'S SECOND
SUBMISSION OF INFORMATION REQUESTS.

AND

CERTIFICATE OF SERVICE

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ATTORNEYS FOR
DEPARTMENT OF DEFENSE

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Application of)
HAWAIIAN ELECTRIC COMPANY, INC.)
For Approval of Rate Increases and)
Revised Rate Schedules and Rules)

DOCKET NO. 2008-0083

DEPARTMENT OF DEFENSE'S SECOND
SET OF INFORMATION REQUESTS
TO HAWAIIAN ELECTRIC COMPANY, INC.

COMES NOW, DEPARTMENT OF DEFENSE by and through its undersigned
attorneys and hereby submits its Second Set of Information Requests to Hawaiian Electric
Company, Inc.

DATED: Honolulu, Hawaii, September 9, 2008.



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ATTORNEYS FOR
DEPARTMENT OF DEFENSE

DOCKET NO. 2006-0386

DEPARTMENT OF DEFENSE'S SECOND
SUBMISSION OF INFORMATION REQUESTS
TO HAWAIIAN ELECTRIC COMPANY, INC.
INSTRUCTIONS

In order to expedite and facilitate Department of Defense's review and analysis in the above matter, the following is requested:

1. For each response, HECO should identify the person who is responsible for preparing the response as well as the witness who will be responsible for sponsoring the response should there be an evidentiary hearing;
2. Unless otherwise specifically requested, for applicable schedules or workpapers, HECO should provide hard copies of each schedule or workpaper together with one copy of each such schedule or workpaper on electronic media in a mutually agreeable format (e.g., Excel and Quattro Pro, to name two examples); and
3. When an information request makes reference to specific documentation used by HECO to support its response, it is not intended that the response be limited to just the specific document referenced in the request. The response should include any non-privileged memoranda, internal or external studies, assumptions, HECO instructions, or any other relevant authoritative source which HECO used.
4. Should HECO claim that any information is not discoverable for any reason:
 - a. State all claimed privileges and objections to disclosure;
 - b. State all facts and reasons supporting each claimed privilege and objection;
 - c. State under what conditions HECO is willing to permit disclosure to Department of Defense (e.g., protective agreement, review at business offices, etc.); and

d. If HECO claims that a written document or electronic file is not discoverable, besides complying with subparagraphs 4(a-c), identify each document or electronic file, or portions thereof, that HECO claims are privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).

5. Please provide each response in electronic format (if available) as well as paper. Please provide two paper copies of each response, with one copy going directly via overnight delivery to DOD at the following address:

Dr. Khojasteh Davoodi
NAVFAC HQ ACQ-URASO
1322 Patterson Avenue, S.E., Suite 1000
Washington Navy Yard
Washington, D.C. 20374-5065
E-mail: Khojasteh.Davoodi@navy.mil
Ph. (202) 685-3319
Fax: (202) 433-7159

and one copy going directly via overnight delivery to DOD's consultant at the following address:

Mr. Maurice Brubaker
Brubaker and Associates, Inc.
P.O.Box 412000
1215 Fern Ridge Parkway, Suite 208
St. Louis, MO 63141-2000
E-mail: mbrubaker@consultbai.com
Ph:(314)275-7007

Please also provide responses in electronic format to Dr. Davoodi and Brubaker and Associates, Inc. at the E-mail addresses above, and to Mr. David Coker at david.coker@navy.mil and Mr. Gayle Chestnut at gayle.chestnut@navy.mil.

DEPARTMENT OF DEFENSE'S SECOND SET OF INFORMATION REQUESTS

TO HAWAIIAN ELECTRIC COMPANY, INC.

DOCKET NO. 2008-0083

The following information requests are directed to HECO.

- DOD-63 Please provide, in native format, an executable copy with all formulas intact, of each cost of service study that is presented in HECO Exhibit 2201.
- DOD-64 Please provide, in native format, an executable copy with all formulas intact, of each cost of service study that is presented in HECO Exhibit 2202
- DOD-65. Please provide, in native format, an executable copy with all formulas intact, of each cost of service study that is presented in HECO Exhibit 2203
- DOD-66 Please provide, in native format, an executable copy with all formulas intact, of each cost of service study that is presented in HECO Exhibit 2204.

- DOD-67 Please provide, in native format, an executable copy with all formulas intact, of each cost of service study that is presented in HECO Exhibit 2205.
- DOD-68 Please provide, in native format, an executable copy with all formulas intact, of each cost of service study that is presented in HECO Exhibit 2206.
- DOD-69 Please provide a copy of Exhibit 2214 in executable native load format, with all formulas intact.
- DOD-70 To the extent not provided in response to the preceding data requests, please provide an executable copy in native format with all formulas intact of all workpapers supporting Exhibit T-22.
- DOD-71 Referring to page 104 of HECO-WP-2214, please provide for the PP customers, the PT customers and the DS customers the demand and energy billing determinants, by block, under present rates, as well as all other information required to develop the "base revenues" shown in Column B.
- DOD-72 Please state whether any customers who currently receive the substation discount on Rate Schedule PP would not be eligible to

receive service on Schedule DS. If there are any such customers, please provide the aggregated billing determinants, by block, for these customers.

DOD-73 Please provide a listing of the account numbers for each customer deemed to be eligible to take service on the DS rate.

DOD-74 Please provide the equivalent of pages 2 and 3 of HECO-WP-2203 using the present definition of customer classes and subclasses.

DOD-75 If not provided in response to other data requests, please provide complete workpapers, in executable native load format with all formulas intact where so available, for the cost allocation studies that are based on the present definition of customer classes and subclasses.

DOD-76 With respect to HECO-WP-2217, please respond to the following:

- a) Are the Kvarhr shown on line 7 just those associated with service to Schedules J, PP, PS and PT?
- b) Are the capacity costs shown on line 3 associated only with service to Schedules J, PP, PS and PT?
- c) If the answer to part a. is affirmative, and the answer to part b. is negative, what is the meaning and relevance of the calculation?

d) Please explain the basis for including fuel and purchased power revenue requirements in the calculation of the cost of supplying reactive power.

e) Please provide all studies which support the linear relationship between the Kvarhr and fuel and purchased power costs.

f) Please provide the workpapers showing the derivation of the percentages on line 1 of this exhibit, or point to the specific page or pages in the workpapers where this calculation is made.

g) Please provide the total installed Kvar capacity of the capacitor banks that were included in the calculations to produce the percentages shown on line 1.

CERTIFICATE OF SERVICE

I hereby certify that one copy of the foregoing document was duly served upon the following parties, by personal service, hand-delivery, and/or U.S. mail, postage prepaid, and properly addressed pursuant to HAR sec. 6-61-21(d).

Ms. Catherine P. Awakuni
Executive Director
Division of Consumer Advocacy
Department of Commerce and Consumer Affairs
P. O. Box 541
Honolulu, HI 96809

2 Copies

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DATED: September 9, 2008, Honolulu, Hawaii



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